

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

§

IOENGINE, LLC,

Plaintiff/Counterclaim Defendant, §

§ C.A. No. 18-452-WCB

v. §

§ JURY TRIAL DEMANDED

PAYPAL HOLDINGS, INC., §

Defendant/Counterclaim Plaintiff. §

§ **UNREDACTED PUBLIC VERSION**

**DECLARATION OF GREGORY T. CHUEBON IN SUPPORT OF IOENGINE, LLC'S
SUBMISSION REGARDING REMAINING PRETRIAL PROCEEDINGS**

I, Gregory T. Chuebon, declare as follows:

1. I am an attorney of record for Plaintiff/Counterclaim Defendant IOENGINE, LLC in the above-captioned action. I am over the age of eighteen, licensed to practice law in New York, and have been admitted *pro hac vice* to this Court for the above-captioned action. I have personal knowledge of the facts described herein. If called to testify, I could and would do so competently.

2. I submit this Declaration in support of IOENGINE, LLC's Submission Regarding Remaining Pretrial Proceedings.

3. Attached as Exhibit 1 is a true a correct copy of portions of the Court's Memorandum and Order, Docket Entry No. 511 in the above-captioned litigation.

4. Attached as Exhibit 2 is a true a correct copy of the Verdict Form, Docket Entry No. 500 in *Ingenico Inc. v. IOENGINE, LLC*, No. 18-826-WCB.

5. Attached as Exhibit 3 is a true a correct copy of portions of the Expert Report of Dr. Avi Rubin Regarding Validity of U.S. Patent Nos. 9,059,969 and 9,774,703.

6. Attached as Exhibit 4 is a true a correct copy of portions of Plaintiff IOENGINE, LLC's Final Claim Charts.

7. Attached as Exhibit 5 is a true a correct copy of portions of the Omnibus Pretrial Order, Docket Entry No. 487 in *Ingenico Inc. v. IOENGINE, LLC*, No. 18-826-WCB.

8. Attached as Exhibit 6 is a true a correct copy of portions of the Expert Report of Dr. Avi Rubin Regarding Infringement of U.S. Patent Nos. 9,059,969 and 9,774,703.

9. Attached as Exhibit 7 is a true a correct copy of the Fourth Revised Scheduling Order, Docket Entry No. 254 in the above-captioned litigation.

10. Attached as Exhibit 8 is a true a correct copy of the publicly available version PayPal and Ingenico's Opening Brief in Support of Their Motions for Summary Judgment and Daubert Motions, Docket Entry No. 412 in the above-captioned litigation.

11. Attached as Exhibit 9 is a true a correct copy of portions of the First Amended Complaint for Patent Infringement, Docket Entry No. 79 in the above-captioned litigation.

12. Attached as Exhibit 10 is a true a correct copy of portions of a transcript for a November 20, 2020 teleconference, Docket Entry No. 140 in the above-captioned litigation.

13. Attached as Exhibit 11 is a true a correct copy of portions of Plaintiff IOENGINE, LLC's Initial Claim Charts.

14. Attached as Exhibit 12 is a true a correct copy of portions of Defendant PayPal Holdings, Inc.'s Initial Invalidity Contentions.

15. Attached as Exhibit 13 is a true a correct copy of portions of a transcript for the July 14, 2022 jury trial, Docket Entry 519-2, in the above-captioned litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of June, in New York, New York.

/s/ Gregory T. Chuebon
Gregory T. Chuebon